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March 23, 1995

**BY HAND DELIVERY**

Mr. William F. Caton  
Acting Secretary  
Federal Communications Commission  
1919 M Street, N.W., Room 222  
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

Re: MM Docket Nos. 94-150, 92-51, 87-154  
Attribution of Broadcast Interests

Dear Mr. Caton:

Transmitted herewith on behalf of Communications Corporation of America, Pappas Stations Partnership, and Fant Broadcasting Company of Nebraska, Inc., are an original and four(4) copies of their Motion for Extension of Time, requesting an extension of comment and reply comment dates in the above-referenced proceeding.

Should any question arise concerning this matter, please communicate with this office.

Very truly yours,

FLETCHER, HEALD & HILDRETH, P.L.C.

*Patricia A. Mahoney*

Patricia A. Mahoney

Counsel for

Communications Corporation of America,  
Pappas Stations Partnership, and  
Fant Broadcasting Company of Nebraska, Inc.

PAM/dlr

cc: Roy J. Stewart, Esquire (by hand delivery)  
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MAR 23 1995

BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

In the Matter of	)	
	)	
Review of the Commission's	)	MM Docket No. 94-150
Regulations Governing Attribution	)	
of Broadcast Interests	)	DOCKET FILE COPY ORIGINAL
	)	
Review of the Commission's	)	MM Docket No. 92-51
Regulations and Policies	)	
Affecting Investment	)	
in the Broadcast Industry	)	
	)	
Reexamination of the Commission's	)	MM Docket No. 87-154
Cross-Interest Policy	)	

Directed to: The Commission

**MOTION FOR EXTENSION OF TIME**

Communications Corporation of America and its subsidiaries ("CCA"),<sup>1</sup> Pappas Stations Partnership and its subsidiaries ("Pappas"),<sup>2</sup> and Fant Broadcasting Company of Nebraska, Inc. and its affiliated companies ("Fant")<sup>3</sup> hereby respectfully move that the time by which comments and reply comments must be submitted in response to the Notice of Proposed Rule Making ("Attribution NPRM"), FCC 94-324 (released January 12, 1995), in the above-captioned proceeding be extended to June 17, 1995, and July 17, 1995, respectively. In support whereof,

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<sup>1</sup>CCA owns and controls the licensees of KPEJ-TV, Odessa, Texas, KWKT-TV, Waco, Texas, KVEO-TV, Brownsville, Texas, KMSS-TV, Shreveport, Louisiana, and WGMB-TV, Baton Rouge, Louisiana.

<sup>2</sup>Pappas owns and controls the licensees of KMPH(TV), Visalia, California, KPTM(TV), Omaha, Nebraska, and KPWB-TV, Sacramento, California.

<sup>3</sup>Fant owns and controls the licensees of KHGI-TV, Kearney, Nebraska, KSNB-TV, Superior, Nebraska, KWNB-TV, Hayes Center, Nebraska, WNAL-TV, Gadsden, Alabama, and WWHO-TV, Chillicothe, Ohio.

the following is submitted:

On December 15, 1994, the Commission adopted three related notices of proposed rulemaking treating broadcast ownership issues: a Further Notice of Proposed Rule Making in MM Docket No. 91-221 ("TV Rules NPRM"); the above-referenced Attribution NPRM in this proceeding; and the Notice of Proposed Rule Making in MM Docket Nos. 94-149 and 91-140 ("Minority and Female Ownership NPRM"). The three proceedings were described as "companion" and "concurrent;" and it is clear that they address interrelated issues, for example, how the Commission should treat time brokerage and local marketing agreements. All three proceedings, as adopted, have common deadlines for comments (April 17, 1995) and replies (May 17, 1995).

On March 16, 1995, LIN Television Corporation, on behalf of sixteen television broadcast licensees (collectively, the "Television Licensees"), filed a Request for Extension of Time, requesting an extension of the time in which to file comments and reply comments on the TV Rules NPRM to June 17, 1995, and July 17, 1995, respectively. The Television Licensees did not, however, request an extension of time for comments and replies in response to the Attribution NPRM or Minority and Female Ownership NPRM.<sup>4</sup> As indicated by the Television Licensees in their Request, CCA, Pappas and Fant support that Request and believe that the requested extension is necessary given the nature of the economic and statistical analyses sought by the Commission, especially since such analyses are not already on hand but must be developed.

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<sup>4</sup>CCA, Pappas, and Fant do not herein request any extension of the dates for comments and replies in the Minority and Female Ownership proceeding, although they would support an extension of the common comment and reply comment dates in all three companion proceedings.

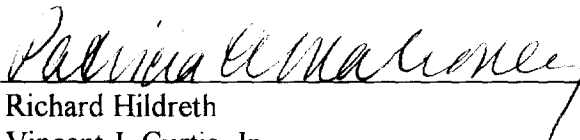
Clearly data and analyses prepared and developed for comments in the TV Rules proceeding will be relevant, useful, and necessary for comments in the Attribution proceeding, a matter the Commission obviously understood when it chose to address all three ownership rulemaking proceedings together. Accordingly, CCA, Pappas, and Fant request that, when the Commission grants the requested extension of time in response to the Request (which CCA, Pappas, and Fant fully support), the Commission also grant an extension of the comment and reply comment dates in this proceeding, so that there will be common filing dates in both the TV Rules proceeding and the Attribution proceeding and the two proceedings will continue to progress concurrently.

Respectfully submitted,

COMMUNICATIONS CORPORATION OF AMERICA,

PAPPAS STATIONS PARTNERSHIP, and

FANT BROADCASTING COMPANY OF NEBRASKA, INC.

By:   
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March 23, 1995